

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEFENDANT DEXIA BANK BELGIUM'S UNOPPOSED MOTION FOR LEAVE TO
FILE DECLARATION UNDER SEAL**

Defendant Dexia Bank Belgium ("Dexia") hereby moves this Court pursuant to Local Rule 7.2, for orders authorizing the filing under seal, in each of the above-captioned actions, of the Declaration of Jeff E. Butler dated June 1, 2006, together with the exhibits thereto ("Butler Declaration").

In support of this unopposed motion, Dexia states as follows:

1. On May 31, 2005, the Court entered an Order Governing the Treatment of Confidential Information in each of the above-captioned actions (the "Confidentiality Order"). A true and correct copy of the Confidentiality Order is annexed hereto as **Exhibit A**. Under the terms of the Confidentiality Order, memoranda of law and declarations containing or disclosing materials that a producing party has designated as "Confidential Information" must be filed with the Court under seal.

2. On June 1, 2006, Dexia filed and served a Motion for a Protective Order Preventing the Depositions of Axel Miller and Stefaan Decraene.

3. On June 1, 2006, Dexia also filed the instant motion to file the Declaration of Jeff E. Butler, dated June 1, 2006, together with the exhibits thereto, under seal.

4. On June 1, 2006, Dexia served the Butler Declaration on all counsel for Plaintiffs. *See* Certificate of Service annexed hereto as **Exhibit B**.

5. The Butler Declaration has not been filed with the Court because the exhibits thereto contain documents designated confidential under the terms of the Confidentiality Order.

CERTIFICATION

The undersigned counsel hereby certifies, pursuant to Local Rule 7.1(A)(2), that counsel for Plaintiffs do not oppose the instant motion seeking to file papers under seal.

WHEREFORE, Dexia respectfully requests that this Court enter an order authorizing the filing under seal, in each of the above-captioned actions, of the Declaration of Jeff E. Butler dated June 1, 2006, together with the exhibits thereto.

Dated: June 1, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

By: /s/ Breton Leone-Quick
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Counsel for Dexia Bank Belgium

Certificate of Service

I, Breton Leone-Quick, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 1, 2006.

/s/ Breton Leone-Quick

Dated: June 1, 2006